

# Exhibit 11

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
One Bowling Greene  
New York, NY 10004-1408

(Title of Action) Motion for Extension of Time

IN RE: GEORGIA CANDEMERES: OTERO Case No. 19-12834-smb

CHAPTER: 7

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NOTICE OF MOTION

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PLEASE TAKE NOTICE Georgia Candemeres Otero

will move before the Honorable Stuart M. Bernstein, on  
November 1, 2019

Debtor's Emergency Motion to Extend Time  
to File Schedules and Statements  
for an Order \_\_\_\_\_  
(describe type of relief being sought)

FILED  
U.S. BANKRUPTCY COURT  
N.Y.

2019 SEP 17 PM 1:08

N.Y.

Georgia Candemeres Otero

Name

505 LaGuardia Place

Apt 9B

New York, NY 10012

Address

Date: September 17, 2019

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK *FILED*  
One Bowling Greene U.S. BANKRUPTCY COURT  
New York, NY 10004-1408  
2019 SEP 17 P 1:07

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In re: Georgia Candemeres Otero

CASE NO.: ~~19-31145~~ -smb  
~~19-12834-Smb~~  
CHAPTER 7

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**DEBTORS' EMERGENCY MOTION TO EXTEND  
TIME TO FILE SCHEDULES AND STATEMENTS**

The above-captioned debtor and debtors-in possession (collectively, the "Debtors") respectfully submits this Emergency Motion to Extend Time to File Schedules and Statements (the "Motion") and, in support thereof, states as follows:

**JURISDICTION**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§157 and 1.334. Venue is proper in this Court pursuant to 28 U.S.C. §§1408 and 1409. This matter is a core proceeding pursuant to U.S.C. § 157(b).
2. The relief sought is based upon section 521 of Title 11 of the United States Code ("Bankruptcy Code"), Rules 1007 and 9006 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules").

**BACKGROUND FACTS**

3. On September 5, 2019, the Debtor filed Chapter 7 in order to halt foreclosure and enforcement thereof.
4. The Debtors request for a Thirty-Day Extension to File Credit Counseling Certificate was granted resulting from medical treatments/procedures at Bellevue Hospital under the World Trade Center Health Program for (PTSD) and physiological illnesses, August 16, 22, and 23, 2019 respectively.

**RELEIF REQUESTED**

5. The Debtor seeks entry of an Order, (a) granting Debtor a 45-day extension of time to file Schedules and Statements and (b) granting related relief. The Debtor further request that this extension be granted without prejudice to the Debtors' right to request additional time to seek other relief should it become necessary.

**BASIS FOR RELIEF REQUESTED**

6. Pursuant to section 521 (a)(1) of the Bankruptcy Code, the Debtor must file, among other documents, the Schedules and Statements. Bankruptcy Rule 1007(c) provides that, "in a voluntary case, schedules, statements, and other documents required by subdivision (b)(1), (4), (5) and (6) shall be filed with the petition within 14 days thereafter...." Fed. R. Bankr. P. 1007(c).

7. Bankruptcy Rule 1007 (c) further provides that the Court may grant "extension[s] of time to file schedules, statements and other documents required under this rule....on motion for cause shown...." Id.

8. Cause exists to grant the Debtors' requested extension of time. As previously referenced herein, Debtor filed Chapter 7 on September 5, 2019 and was granted a Thirty-Day Extension to File Credit Counseling Certificate in connection with various medical treatments/procedures.

9. The Debtors medical treatments/procedures continued on September 9, 2019 (WTC psychiatry Dr. [REDACTED]). Furthermore, the Bankruptcy filing during this difficult period has further compounded Debtors existing PTSD.

10. In anticipation of the 911 solemn anniversary and overwhelmingly stressful (5- hour) WTC monitoring appointment scheduled on September 19, 2019, Dr. [REDACTED] registered and encouraged Debtor to attend the "Managing Stress" support group on

September 18, 2019 at 10:00 AM. The support group appointment has been scheduled before attending another WTC Health Program appointment at 2:20 PM.

11. The aforementioned medical treatments/procedures had been scheduled prior to Debtor having any knowledge of filing for Bankruptcy protection. Notwithstanding, Debtor is extremely grateful for the World Trade Center Health Program which has predominantly provided **essential** treatment options and support systems that were previously unavailable to defendant at [REDACTED] Behavioral Center.

12. The unanticipated Bankruptcy filing and untimely medical treatment/procedures have impaired Debtor from timely seeking necessary assistance with gathering and preparing required Schedules and Statements.

13. Accordingly, the Debtor anticipates that a 45- day extension of time to file the respective Schedules and Statements should be sufficient. However, the Debtor further requests that such extension be without prejudice to the right to seek one or more further extensions of this deadline.

**NOTICE**

14. The Debtor had previously provided Notice of Bankruptcy filing to creditor (US Bank National Association a Legal Title Trustee for Truman 2013 SC4 Title Trust) counsel Gross Polowy, LLC via USPS Priority Mail and will submit this Motion accordingly.

**NO PRIOR REQUEST**

15. No prior request for the relief sought in this Motion has been made to this or any other Court.

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WHEREFORE, the Debtor respectfully request that the Court enters the proposed Order attached hereto as **Exhibit A**, (a) grant this motion; and (b) grant the Debtor such other and further relief as this Court deems appropriate.

Dated: 9-17-2019



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**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
One Bowling Greene  
New York, NY 10004-1408

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In re: Georgia Candemeres Otero

CASE NO.: 19-12834 -smb

CHAPTER 7

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**ORDER GRANTING DEBTORS EMERGENCY MOTION TO  
EXTEND TIME TO FILE SCHEDULES AND STATEMENTS**

Upon consideration of the Emergency Motion to Extend Time to File Schedules and Statements ("the Motion") filed by the above-captioned debtor and debtors-in possession (collectively, the "Debtors"): and this Court being satisfied that the relief requested in this Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest: and after consideration of any oppositions filed thereto: and it appearing that adequate notice thereof was provided and that no other or further notice need to be given; and after due deliberation, and sufficient cause appearing therefore: and after any hearing held thereon; it is therefore, by the United States Bankruptcy Court for the Southern District of New York, hereby:

ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Pursuant to Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c) and 9006(b), the time by which Debtors shall file Schedules and Statements is extended for an additional 45 days, to and including October \_\_\_\_\_ 2019, without prejudice to the Debtors right to request a further extension.
3. All periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

4. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2019

New York, N.Y.

UNITED STATES BANKRUPTCY JUDGE